

## **REMARKS**

Claims 1-19 are now pending in the application. Claims 1-3, 5, 7, 9 and 12-13 have been amended herein. Minor amendments have been made to correct some formalities and grammatical errors noted in some of the pending claims. Claims 14-19 have been withdrawn herein. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **Claim Rejections - 35 USC § 102**

The Examiner rejected claims 1-2, 6, 8 and 9 under 35 USC § 102(b) as being anticipated by Ramirez *et al.* (US 6,476,858). The rejection is respectfully traversed.

In particular, the Examiner asserts that Ramirez *et al.* teaches a central controller and a plurality of digital still camera units operatively connected to the central controller. However, Ramirez *et al.* exclusively concerns video monitoring using video cameras, and does not disclose or suggest the use of digital still camera units. For example, see the Summary of Invention of Ramirez *et al.* at col. 2, lines 44-49: “Video information from a single camera or from a plurality of cameras is independently digitized, scaled and displayed on different windows. Image size and selection for black and white or color may be varied according to the NTSC standard 160x120, 320x240 and 640x480.” The standards identified by Ramirez *et al.* are all National Television System Committee (NTSC) standards that concern video transmissions, and are not applicable to digital still images. Numerous other passages in Ramirez *et al.* make it clear that Ramirez *et al.* only concerns video data from video cameras. For example, Ramirez *et al.* at col. 4, lines 21-24 states: “The system records video camera information in a compressed

format when motion is detected either by analyzing the camera video signal or through motion detection devices.”

The present invention as currently claimed concerns only digital still camera units and associated digital still image data. As would have been appreciated by those having ordinary skill in the art at the time of filing the present application, the capture, storage, transmission and analysis of video data are all very different from the capture, storage, transmission and analysis of still image data. As noted in the background of the present application:

[0002] ... First, wiring both power and data cables to each of the cameras significantly increases costs and complexity. Second, the amount of data received and recorded by a system frequently becomes unmanageable. Third, the ability to monitor simultaneously all of the cameras decreases, resulting in a higher probability that an anomalous event such as a security breach will go unnoticed.

[0003] Further, individual cameras of existing video security systems generally require wired connections to both a mains power supply and to a device for receiving and recording images such as a video recorder. Such existing cameras are thus prohibitively expensive and impractical for many applications where easy access to such wired connections is unavailable.

The present invention also enables significant advantages to be achieved by using still images. For example, as described in the present specification as filed at page 9, lines 12-21, ¶[0051]:

“According to the present invention, the power consumption of a camera unit 110 may be dramatically reduced by first recording still images rather than video. A still image camera uses much less power than a video camera. However, the present invention is able to achieve most of the security benefits of live video by timing the still images reasonably close together and by using image analysis software to detect changes between sequentially recorded still images. As mentioned above, such image analysis software may be used to detect simple motion, or may be used to detect pre-defined anomalous events such as the presence of a person in a particular portion of an image such as near a fence line.”

Further, by manipulating digital still image data, embodiments of the present invention are able to more economically store image data (as stored digital still image data generally requires less memory than corresponding stored video data), and are able to reduce data transmission times between a camera unit, a central controller, and a monitoring station.

In rejecting claim 1, the Examiner equates the computer readable program code recited in claim 1 with “the software running on 1a-1d called the VS client controls the hardware referenced in the block diagram of figure 8, column 4, lines 41-44” described in Ramierz *et al.* See, Office Action, p. 5. Applicants respectfully disagree. The VS client is described as “the hardware residing inside systems 1a-1d and software loaded on standard PC platforms....” Col. 4, lines 36-38. The VS client is not “stored on the first memory” operatively connected to the micro controller of at least one of the plurality of digital still camera units as recited in claim 1. Furthermore, Applicants submit that Ramierz *et al.* does not describe a micro controller to “determine whether the digital still image data should be transmitted to the central controller” or a central controller to determine “whether the digital still image data should be transmitted to a monitoring station” as recited in claim 1 or the related steps recited in claim 9.

It is therefore respectfully submitted that the disclosure of Ramirez *et al.* concerning video cameras and video data cannot anticipate the claims of the present invention, which claims particularly concern digital still camera units and the processing of the digital still image data.

However, to more clearly emphasize that the present claims concern digital still image data from the digital still camera units, claims 1 and 9 have hereby been

amended to explicitly recite that received image data is digital still image data. It is submitted that because amended independent claims 1 and 9 should be considered allowable over the cited art, then dependent claims 2-8 and 10-13 also should be considered allowable.

### **Claim Rejections - 35 USC § 103**

Claims 3-5 and 10-12 were rejected under 35 USC 103(a) as being unpatentable over Ramirez *et al.* (US 6,476,858) in view of Rajeev *et al.* (CA 2,242,322). The rejection is respectfully traversed.

The Examiner acknowledges that Ramirez *et al.* fails to teach a mesh networking protocol enabling image data to be routed indirectly and wirelessly through one or more camera units to a central controller, fails to teach that at least one of the camera units comprises a microphone, and fails to teach the use of both color and black and white image sensors to improve light sensitivity. However, the Examiner then cites Rajeev *et al.* as disclosing all of these missing features.

It is respectfully submitted that the combination of Ramirez *et al.* and Rajeev *et al.* cannot render obvious the claims of the present invention under 35 USC 103(a) because Rajeev *et al.* also exclusively concerns video cameras and video data. See, for example, the Summary of Invention of Rajeev *et al.* at page 7, lines 19-21: “The apparatus comprises a video camera which captures video images and outputs them in one of several industry standard video formats.” (Emphasis added.) Similar to the arguments presented above concerning Ramirez *et al.*, it is thus not possible for Rajeev *et al.* to teach or suggest the features of the present claims concerning the capture, storage, and analysis of digital still image data.

The Applicant thus respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney at the telephone number indicated below.

**Election/Restrictions**

The Applicant affirms the provisional election made with traverse to prosecute the invention of "image monitoring using a plurality of camera units operatively connected to each other and to a central controller using wireless communications", claims 1-13.

**Allowable Subject Matter**

The Applicant thanks the Examiner for the notice of allowable subject matter concerning claims 7 and 13.

**CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

/David A. McClaughry/

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By: \_\_\_\_\_

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